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Plaintiffs

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INC., TAKEDA PHARMACEUTICALS LLC,  
12 AND TAKEDA PHARMACEUTICALS  
AMERICA, INC.

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Attorneys for Defendant

SANDOZ INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

17 TAKEDA PHARMACEUTICALS, CO., LTD., )  
18 TAKEDA PHARMACEUTICALS U.S.A, INC., )  
19 TAKEDA PHARMACEUTICALS LLC, and )  
20 TAKEDA PHARMACEUTICALS )  
AMERICA, INC., )

Plaintiffs, )

v. )

SANDOZ, INC., )

Defendant. )

Case No. 3:12-cv-0446 JCS

**STIPULATION AND [PROPOSED]  
ORDER TO AMEND THE FURTHER  
CASE MANAGEMENT AND PRETRIAL  
ORDER**

The Honorable Joseph C. Spero

Complaint Filed: January 26, 2012

**[REDACTED]**

Pursuant to this Court's Civil Standing Orders and Civil Local Rules 6-1, 6-2, 7-12, and 16-10(c), Plaintiffs Takeda Pharmaceutical Company Limited, Takeda Pharmaceuticals U.S.A., Inc., Takeda Pharmaceuticals LLC, and Takeda Pharmaceuticals America, Inc., (collectively, "Takeda"), and Defendant Sandoz Inc. ("Sandoz") (collectively, the "Parties") stipulate and agree as follows:

WHEREAS, on June 1, 2012, the Court held the initial case management conference in this case;

WHEREAS, on June 6, 2012 the Court entered its Case Management and Pretrial Order [Docket No. 50] ("June 2012 Order");

WHEREAS, on September 7, 2012, the Court held a further case management conference;

WHEREAS, on September 11, 2012 the Court modified the June 2012 Order in its Further Case Management and Pretrial Order [Docket No. 55] ("September 2012 Order");

WHEREAS, on December 14, 2012, the Court held a further case management conference;

WHEREAS, on December 19, 2012 the Court modified the September 2012 Order in its Further Case Management and Pretrial Order [Docket No. 63] ("December 2012 Order");

WHEREAS, on April 9, 2013, the Court modified the December 2012 Order in its Further Case Management and Pretrial Order [Docket No. 76] ("April 2013 Order");

WHEREAS, on June 19, 2013, the Court granted Plaintiffs' motion to amend their infringement contentions to assert infringement under the doctrine of equivalents [Docket No. 92];

WHEREAS, the Parties, in light of Plaintiffs' Amended Infringement Contentions, have conferred and agreed upon related adjustments to the Schedule set forth in the April 2013 Order;

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THEREFORE, the undersigned Parties submit this stipulated request and respectfully request the Court amend April 2013 Order as follows:

Event	Current Date	Proposed Change
Fact Discovery Cut-Off	Friday, 07/19/13	Friday, 10/11/2013
Initial Expert Reports on Issues where party Bears Burden of Proof. Takeda will provide any report on secondary considerations at this time.	Friday, 08/30/13	Friday, 11/22/2013
Rebuttal Expert Reports	Friday, 09/27/13	Friday, 12/20/2013
Expert Discovery Cut-Off	Friday, 10/25/13	Friday, 1/17/2014
Last Day to File Dispositive Motions	Friday, 11/15/13	Friday, 2/7/2014
Oppositions Due for Dispositive Motions	Friday, 12/06/13	Friday, 2/28/2014
Replies Due for Dispositive Motions Filed	Friday, 12/20/13	Friday, 3/14/2014
Motions Hearing	Friday, 02/28/14 9:30 a.m.	To be set at a future case management conference
Pretrial Conference	To be set at a future case management conference	(no change)
Trial	To be set at a future case management conference	(no change)

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

Respectfully submitted,

Dated: July 2, 2013

MUNGER, TOLLES & OLSON LLP

By: /s/ Ryan N. Hagglund  
Attorneys for Plaintiffs  
TAKEDA PHARMACEUTICAL CO., LTD.,  
TAKEDA PHARMACEUTICALS U.S.A., INC.,  
TAKEDA PHARMACEUTICALS LLC, AND  
TAKEDA PHARMACEUTICALS AMERICA,  
INC.

Dated: July 2, 2013

WINSTON & STRAWN LLP

By: /s/ K. Joon Oh  
Maureen Rurka (admitted *pro hac vice*)  
Julia Mano Johnson (admitted *pro hac vice*)  
Jeffrey J. Lederman  
K. Joon Oh

Attorneys for Defendant Sandoz, Inc.

**FILER'S ATTESTATION**

I, K. Joon Oh, am the ECF user whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER**. In accordance with Local Rule 5-1(i)(3), I hereby attest that the above-named signatories concur in this filing.

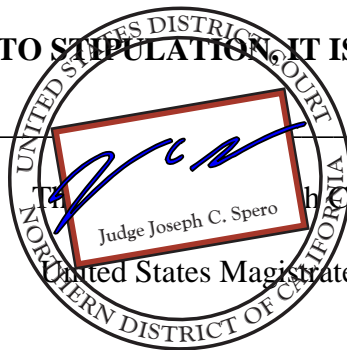
DATED: July 2, 2013

By:

/s/ K. Joon Oh

**PURSUANT TO STIPULATION IT IS SO ORDERED.**

Dated: 7/9/13



h.c. Spero

United States Magistrate Judge

SF:357492.1

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